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7 **UNITED STATES DISTRICT COURT**
8 **DISTRICT OF NEVADA**

9 CHARLES BUTLER, Individually and as
10 Assignees of TERRILYNN MORRISON,

11 Plaintiff,

12 vs.

13 PROGRESSIVE DIRECT INSURANCE
COMPANY; DOES I-V, and ROE
14 CORPORATIONS I-V, inclusive.

15 Defendants.

Case No: 2:23-cv-00566-APG-BNW

**STIPULATION AND ORDER TO
EXTEND DEADLINE FOR
DEFENDANT'S RESPONSE TO
PLAINTIFF'S MOTION SUPPLEMENT
AND AFFIDAVIT
(Second Request)**

17 Plaintiff Charles Butler, by and through his attorneys of record, LAW OFFICE OF DAVID
18 SAMPSON, LLC, and Defendant Progressive Direct Insurance Company, by and through its
19 attorneys of record, BARRON & PRUITT, LLP, hereby agree and stipulate to extend by two days
20 the deadline for Defendant Progressive Direct Insurance Company to file a Response to Plaintiff's
21 Motion Supplement and Affidavit Fulfilling the 56(D) Requirements in Support of Opposition to
22 Defendant's Motion for Summary Judgment and Counter-Motion for Continuance Rule 56(D)
23 Affidavit (Dockets #54 and 55).

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Plaintiff's Motion Supplement and Affidavit Fulfilling the 56(D) Requirements in Support of Opposition to Defendant's Motion for Summary Judgment and Counter-Motion for Continuance Rule 56(D) Affidavit was filed on December 10, 2024. The parties previously stipulated to extend Defendant's response deadline to January 14, 2025 (*see* Docket #57). Plaintiff is in agreement with and stipulates to Defendant Progressive Direct Insurance Company's request for an additional two-day extension up to and including January 16, 2025 to allow Defendant Progressive Direct Insurance Company to file a response to said Motion Supplement and Affidavit.

The requested extension of time is needed due to illness of counsel. Shortly after a mediation last week, Mr. Pruitt, as counsel for Progressive Direct Insurance Company, became ill and has been unable to perform his duties due to such illness. Counsel anticipates returning to the office and resuming his duties this week and requests a two-day extension for filing Defendant's response.

Counsel further state that the requested extension of discovery is not interposed for purposes of delay, but rather for the purposes set forth above.

DATED this 13th day of January, 2025

DATED this 13th day of January, 2025

BARRON & PRUITT, LLP

LAW OFFICE OF DAVID SAMPSON, LLC

/s/ William H. Pruitt
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/s/ David Sampson
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Attorney for Plaintiffs

IT IS SO ORDERED.


UNITED STATES DISTRICT COURT JUDGE

DATED: ____ January 14, 2025 ____

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